

FILED

APR 06 2023

CARMELITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA
BY 47 DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

BRUCE DWAIN COPELAND)

Plaintiff,)

-vs-)

CITY OF EL RENO, OKLAHOMA,)

PAUL BROYLES, Individually,)

JAY K. ARNOLD, individually)

JOSHUA HOLLMAN, individually,)

, and DOES 1-10)

Defendants,)

CIV 23 293 J

ORIGINAL COMPLAINT FOR VIOLATION OF CIVIL RIGHTS UNDER
42 U.S.C. BIVENS ACTION, CONSPIRACY TO VIOLATE CIVIL RIGHTS,
FRAUD, CONSPIRACY TO COMMIT FRAUD, ABUSE OF OFFICE,
UNJUST ENRICHMENT, NEGLIGENCE, DAMAGES, SPECIAL
DAMAGES, PUNITIVE DAMAGES,

COMES, NOW, Plaintiff Bruce Dwain Copeland ("Plaintiff Copeland")

Files this complaint against certain Defendants for violating his constitutional.
rights.

JURIDICTION

Jurisdiction is proper for Plaintiff brings this suit against Defendants for
violation of his civil rights, Plaintiff is currently a citizen of the State of Louisiana,
and the amount in controversy exceeds 75,000.00.

VENUE

Venue is proper because the Defendants are based in the State of Oklahoma and the events complained of occurred in the State of Oklahoma.

PARTIES

PLAINTIFF Copeland is currently a citizen of the State of Louisiana. Plaintiff Copeland resides at 9016 Nelson St. in the city of New Orleans, La. 70118.

DEFENDANT City of El Reno is a municipality located in the County of Canadian and in the State of Oklahoma. The City of El Reno is located at 101 N. Choctaw, El Reno, OK. 73036

DEFENDANT Paul Broyles (“Defendant Broyles”) is a Code enforcement officer in the city of El Reno. Defendant Broyles has a principal business address of 101 N. Choctaw, El Reno, Ok, 73036.

DEFENDANT Jay K. Arnold (“Defendant Arnold”) is the Treasurer of Canadian County. Defendant Arnold has a principal business address of 201 N. Choctaw in El Reno, Ok. 73036.

DEFENDANT Joshua Hollman (“Defendant Hollman”) is a citizen of the State of Oklahoma. Defendant Hollman resides in Oklahoma City.

COUNT 1

VIOLATION OF CIVIL RIGHTS UNDER 42 U.S.C. § 1983, BIVENS ACTIONS

Plaintiff Copeland alleges and believes these Defendants, each of them, have violated his civil rights. Plaintiff Copeland alleges and believes these Defendants, each of them, have caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

COUNT 2

CONSPIRACY TO VIOLATE CIVIL RIGHTS

Plaintiff Copeland alleges and believes these Defendants, each of them, has conspired to violate his civil rights. Plaintiff Copeland alleges and believes these Defendants, each of them, have caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

COUNT 3

BIVENS ACTION

Plaintiff Copeland alleges and believes these Defendants, each of them, has violated his civil rights. Plaintiff Copeland alleges and believes these Defendants, each of them, has caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

COUNT 4

FRAUD

Plaintiff Copeland alleges and believes these Defendants, each of them, have Committed fraud. Plaintiff Copeland alleges and believes these Defendants, each of them, have caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

COUNT 5

CONSPIRACY TO COMMITT FRAUD

Plaintiff Copeland alleges and believes these Defendants, each of them, have violated his civil rights. Plaintiff Copeland alleges and believes these Defendants, each of them, have caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

COUNT 6

ABUSE OF OFFICE

Plaintiff Copeland alleges and believes these Defendants, each of them, have Abused their office. Plaintiff Copeland alleges and believes these Defendants, each of them, have caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

COUNT 7

UNJUST ENRICHMENT

Plaintiff Copeland alleges and believes these Defendants, each of them, have Been unjustly enriched. Plaintiff Copeland alleges and believes these Defendants, each of them, have caused Plaintiff Copeland harm. Plaintiff Copeland is now seeking damages.

PRAYER

WHEREFORE, Plaintiff prays for the following relief;

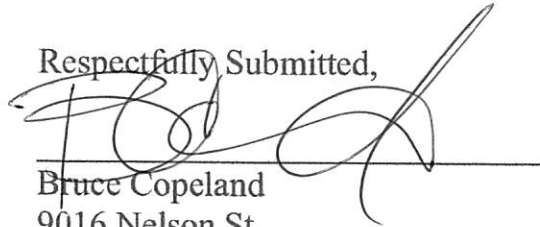
1. A Judgment against Defendants, each of them, in the amount of \$100,000.00 for violation of civil rights, Bivens Action,
2. A Judgment against Defendants, each of them, in the amount of \$100,000.00 for conspiracy to violate civil rights.
3. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For Fraud.
4. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For Conspiracy to commit Fraud.
5. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For abuse of office.
6. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For unjust enrichment.
7. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For Negligence.
8. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For damages.
9. A Judgment against Defendants, each of them, in the amount of \$100,000.00 For Special Damages.

10.A Judgment against Defendants, each of them, in the amount of \$100,000.00
For Punitive Damages.

11.Any Further Relief Deemed proper by the Court.

Dated this 3rd day of April 2023.

Respectfully Submitted,



Bruce Copeland

9016 Nelson St.

New Orleans, LA. 70118

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(972) 897-5872 (m)

(504) 930-6314 (m)

CERTIFICATE OF SERVICE

CITY OF EL RENO
101 N. Choctaw Ave
El Reno, OK. 73036.

Paul Broyles
Code Enforcement
101 N. Choctaw Ave.
El Reno, Ok. 73036

Jay K. Arnold
County Treasurer
201 N. Choctaw Ave
El Reno, Ok. 73036

Joshua Hollman
201 N. Choctaw Ave
El Reno, Ok. 73036

Bruce Copeland